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HARRISBURG, PA

SEP 20 2002

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIAMARY E. D'ANDREA, CLERK
Per [Signature]
Deputy ClerkNANCY HALL, individually and as the
Representative and Administratrix of
the Estate of TOMMY HALL, deceased,
her husband,

Plaintiff,

CIVIL ACTION - LAW

1:01-CV-1265

CUNA MUTUAL GROUP; CUNA
MUTUAL INSURANCE SOCIETY,

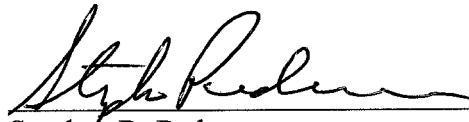
Defendants.

JUDGE CHRISTOPHER CONNER ✓

**PLAINTIFF'S CROSS MOTION FOR
PARTIAL SUMMARY JUDGMENT**

For the reasons expressed in Plaintiff's Brief, Plaintiff hereby submits this Motion for Partial Summary Judgment, requesting that the Court enter judgment against CUNA Mutual Group and CUNA Mutual Insurance Society with respect to Plaintiff's claims that CUNA Mutual Group and CUNA Mutual Insurance Society breached their contract when they denied Nancy Hall and the Estate of Tommy Bob Hall's claim for payment on their home mortgage protection policy. This Motion is supported by the accompanying Brief in response to Defendant's Motion for Partial Summary Judgment and in support of Plaintiff's Cross Motion for Summary Judgment and Plaintiff's Counterstatement of Disputed Material Facts and the 29 exhibits attached to that statement of fact.

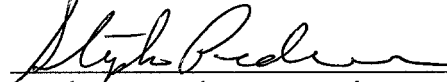
Respectfully submitted,



Stephen R. Pedersen

CERTIFICATE OF NON-CONCURRENCE

I, Stephen R. Pedersen, Plaintiff's counsel, hereby certify that I have contacted defense counsel, who does not concur in the instant Motion for Partial Summary Judgment.

A handwritten signature in cursive script, appearing to read "Stephen R. Pedersen", is written over a horizontal line.

Stephen R. Pedersen, Esquire
214 Senate Avenue
Suite 602
Camp Hill, PA 17011
(717) 763-1170

I. D. No 72026
Counsel for Plaintiff

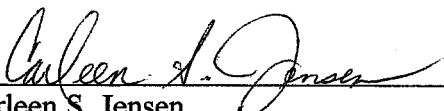
CERTIFICATE OF SERVICE

And now, this 20th day of Sept., 2002, I, Carleen S. Jensen, do hereby certify that I have, this date, served a true and correct copy of the within **BRIEF** upon each of the attorneys of record at the following address(es) by sending same in the United States mail:

Michael R. Kelley, Esq.
Charles T. Young
100 Pine Street
P O Box 1166
Harrisburg, PA 17108-1166

Catherine Mahady-Smith, Esq.
3115-A N. Front Street
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DATE: 9-20-02


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